



February 9, 2024, to respond to Defendants' Motion to Dismiss. As grounds in support of her motion, Plaintiff states:

1. Plaintiff filed her Amended Complaint on October 16, 2023. The Complaint is 42 pages in length and includes six claims of relief against Defendants.

2. Defendants' responsive pleading was initially due on or before December 18, 2023. Due to the complexity and length of the Amended Complaint, counsel for Defendants requested an extension of time of 20 days, up to and including January 7, 2024.

3. Counsel for Plaintiff did not oppose the extension of time sought by Defendants.

4. On December 6, 2023, this Court granted Defendants' Motion for Extension of Time, providing Defendants until January 8, 2024, to file their responsive pleading. Defendants filed a Motion to Dismiss all of Plaintiff's claims on that date, making Plaintiff's response due on January 29, 2024.

5. As counsel for Defendants indicated, this case is complex, implicating the Constitutional, employment, and civil rights of Plaintiff and others in her community and profession. Defendants' Motion to Dismiss is 25-pages, including nearly 45 case citations and discussing multiple statutes. To fully engage in a proper response when Defendants seek to dismiss all of Plaintiff's claims in their entirety against each of the Defendants more preparation and effort than typical is required in this case, thus necessitating additional time to properly brief the issues for the Court at the motion to dismiss stage.

6. In accordance with U.S.D.C.L.R. 7.1(b)(A), counsel for Plaintiff has conferred with counsel for Defendants, and Defendants do not oppose the relief sought by Plaintiff.

Wherefore, Plaintiff respectfully requests an extension of time to respond to Defendants' Motion to Dismiss of ten days, up to and including February 9, 2024.

Date: January 24, 2024

/s/ Iris Halpern

Iris Halpern\*

Azra Taslimi\*

Qusair Mohamedbhai

RATHOD | MOHAMEDBHAI LLC

2701 Lawrence Street

Denver, CO 80205

Telephone: (303) 578-4400

Facsimile: (303) 578-4401

ih@rmlawyers.com

at@rmlawyers.com

qm@rmlawyers.com

*Attorneys for Plaintiff*

*\* Admitted Pro Hac Vice*

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2024, a true and correct copy of the forgoing was filed with the Clerk of the Court using the CM/ECF portal, which will serve all counsel of record.

/s/ Iris Halpern

Counsel for Plaintiff